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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	2:17-cr-00001-JAD-CWH
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	SENTENCING AND DISPOSITION
)	FOR Mr. Oliveira Santos
LEONARDO A. OLIVEIRA-SANTOS,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, LEONARDO AUGUSTO OLIVEIRA SANTOS, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, JOHN PATRICK BURNS, Assistant U.S. Attorney, that the Sentencing in the above-captioned matter currently set for Monday September 18, 2017 at 11:00a.m. be vacated and continued to at least 30 days at a time convenient for the court preferably on a Friday .

This Stipulation is entered into for the following reasons;

1. Other issues remain and are pending that are vital to the sentencing of Mr. Oliveira-Santos.
2. Mr. Oliveira-Santos is in custody and agrees with the requested continuance.
3. Mr Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney, and he has no objection to this continuance.

4. Mr. Leventhal will commence U.S. vs. Bundy, et al., on October 10, 2017, and will not be available from Monday through Thursday during Trial. Therefore, it is respectfully requested that the current sentencing be set for a Friday within the next 30 days if the court is available.

5. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

DATED this 15th day of September, 2017.

/s/ Todd M. Leventhal
TODD M. LEVENTHAL, ESQ.
Counsel for Leonardo A. Oliveira-Santos

/s/ John Patrick Burns
JOHN P. BURNS
Assistant U.S. Attorney

Submitted By: LEVENTHAL & ASSOCIATES, PLLC

By: /s/ Todd M. Leventhal

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	2:17-cr-00001-JAD-CWH
Plaintiff,)	
)	
vs.)	
)	
LEONARDO A. OLIVEIRA-SANTOS)	
)	
)	
Defendant.)	

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. Other issues remain and are pending that are vital to the sentencing of Mr. Oliveira-Santos.
2. Mr. Oliveira-Santos is in custody and agrees with the requested continuance.
3. Mr Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney, and he has no objection to this continuance.
4. Mr. Leventhal will commence U.S. vs. Bundy, et al., on October 10, 2017, and will not be available from Monday through Thursday during Trial. Therefore, it is respectfully requested that the current sentencing be set for a Friday within the next 30 days if the court is available.

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